

# PAUL HASTINGS

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June 17, 2022

## VIA ECF

Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan U.S. Courthouse  
500 Pearl Street  
New York, New York 10007

Re: *In Re Customs and Tax Administration of the Kingdom of Denmark (Skatteforvaltningen) Tax Refund Scheme Litigation*, 18-md-2865 (LAK)

Dear Judge Kaplan:

This law firm represents Skandinaviska Enskilda Banken, Danmark, filial af Skandinaviska Enskilda Banken AB (publ), Sverige ("SEB") in connection with the *In Re Customs and Tax Administration of the Kingdom of Denmark Tax Refund Scheme Litigation*, 18-md-2865 matter pending before the court. SEB is not party to this matter, and has produced documents to plaintiff Skatteforvaltningen pursuant to a June 26, 2020 order of the Copenhagen court in Denmark. Plaintiff SKAT's counsel have informed this law firm that they intend to file, and indeed have filed, exhibits 127, 128, 155, 156, and 157 in connection with their Motion for Summary Judgement on June 14, 2022, which are comprised of documents produced to SKAT by SEB. As a result of certain information in Exhibits 127 and 128 meeting the definition of "Confidential Information" under the Court's Motion Rules and Procedures, and after meeting and conferring with SKAT's counsel, SEB is filing this letter to explain the need for SKAT to redact portions of Exhibits 127 and 128 to its Motion for Summary Judgment.

The redacted information in Exhibits 127 and 128 includes full financial account numbers of SEB clients, covered as "Confidential Information" under the Court's Motion Rules and Procedures. SEB is also subject to local bank secrecy laws governing public disclosure of confidential information, which prohibits public disclosure of information that could be used to identify clients and counterparties. Accordingly, the client BIC/SWIFT code and counterparty BIC/SWIFT codes have been redacted, as have the name and account numbers of relevant transaction counterparties. Also redacted are internal SEB transaction numbers identifying the SEB employee who conducted the searches for relevant information disclosed in the produced exhibits.

Sincerely,

/s/ Amanda L. Pober

Amanda L. Pober  
for PAUL HASTINGS LLP

*Counsel to SEB*